

EXHIBIT A-4

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

151

1 county. Would Mike really be sounding an alarm if his 11:58AM
2 friend Donald Trump had been selected -- 11:58AM

3 Q. Mr. Lindell -- 11:58AM

4 A. -- and they all said, "Absolutely, he would." 11:58AM

5 Q. Mr. Lindell, when was that appearance on Jimmy 11:58AM
6 Kimmel? 11:58AM

7 A. That was in -- I think it was in March of -- 11:58AM
8 March of '21. 11:58AM

9 Q. That was after the "Absolute Proof" 11:58AM
10 documentary, correct? 11:58AM

11 A. Uh-huh. 11:58AM

12 Q. Okay. So before the "Absolute Proof" 11:58AM
13 documentary -- 11:58AM

14 A. Right. 11:58AM

15 Q. -- were you talking about Smartmatic publicly 11:58AM
16 in connection with any attack in connection with the 11:58AM
17 2020 election? 11:58AM

18 A. I was talking about election -- election 11:58AM
19 machines. I don't know if I mentioned Smartmatic. All 11:58AM
20 electronic machines. 11:58AM

21 What I said was, "You guys, we have to get 11:58AM
22 rid of these," because all of the -- all of the states 11:58AM
23 that I found that people voted that didn't live there, 11:58AM
24 so I was done with computers. I was very adamant. 11:58AM

25 Every -- every -- as I would go on shows -- 11:59AM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
152

1 as I would go on shows, they would say, "Oh, you're
2 getting cancelled," but they wouldn't let me talk about
3 why I was getting cancelled, because our company had
4 been attacked by China. There had been a breach by
5 China, and I had mentioned that. I had mentioned all
6 machines. I didn't pick out a single -- I wish I had
7 said ES&S. They're all the same.

8 Q. Okay. So now, let me ask you about right after
9 "Absolute Proof." Did you appear on Steve Bannon's War
10 Room podcast to discuss the documentary shortly after
11 February 5th?

12 A. I don't know. I don't know.

13 Q. Okay.

14 A. The first time I believe I ever was on Bannon,
15 but that could be wrong, was when Dominion sued me.

16 Q. Shortly after "Absolute Proof" was taped on
17 February 5th, 2021, did you discuss Smartmatic with
18 Steve Bannon on his War Room podcast?

19 A. If anything -- I have no idea.

20 Q. Okay. I'm going to show you another exhibit.
21 This one's been previously marked as Exhibit 432. It's
22 been used at another deposition. This clip is a little
23 bit longer than the last one.

24 A. Okay.

25 Q. My colleague's going to come over here and play

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

153

1 it, and it's a little over seven minutes. And then I'll
2 ask you some questions about it.

3 (Clip of Steve Bannon and Mike Lindell.)

4 STEVE BANNON: Dr. Ming from London tells
5 us about that competition. It's about the Chinese
6 Communist Party being the existential threat, the
7 existential enemy of the Chinese people, of the American
8 people, and of all mankind. We've seen this from the
9 CCP virus that came out of Wuhan Lab.

10 We're now joined, it looks like, from a
11 very exclusive club in -- somewhere in Palm Beach,
12 Florida. Been up all night, the great Mike Lindell.
13 Mike Lindell has made a film that looks like a two-hour
14 movie that's playing in a loop on One America News.
15 I think it's up on Gab TV. It's called "Absolute
16 Proof."

17 Mike, here's the first question -- I'm
18 going to get to the China Communist Party in a second,
19 because I understand this film is very centric on CCP's
20 involvement in the 2020 election -- as the director of
21 national intelligence, Ratcliffe warned the nation and
22 warned the president in late -- in mid-January of this
23 year, but I want to go to -- look, Dominion has called
24 your guys' bluff. They're suing FOX, which is the
25 Murdochs where those tough lawyers over there. They're

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

154

1 suing all operations. I think you've gotten letters or
2 you're involved and named in these suits. This doesn't
3 double down, it triples down to the tenth power throwing
4 down on what they've said. Your movie, "Absolute
5 Proof," you don't leave any questions about this.

6 Why -- have you reached out to the Dominion
7 executives, and have you told them, "Hey, I'm prepared
8 to show you this film. I'm prepared here at this
9 question, and why would you throw napalm on a burning
10 brush fire and do it this weekend before the trial next
11 week of President Trump?"

12 MR. LINDELL: Well, the first question is
13 no, I don't respond to Dominion other than, "Yes, please
14 sue me." They sent me a letter yesterday because they
15 heard about this documentary. They sent me an E-mail.
16 It wasn't from lawyers, it was from them going, "Mike,
17 look at all these people that we have here. They're all
18 discredited."

19 Well, the people I have in this are all
20 people that weren't on that list. So this is all the
21 new evidence I've been telling everyone. This is what
22 they're showing everyone, Steve.

23 Just today when this launched this morning,
24 we've had over a million people view it, and it's been
25 taken down by Vimeo or -- and it's been taken down on

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

155

1 other -- two sites crashed it. They're trying to attack
2 it from every angle.

3 You know what? If Dominion and
4 Smartmatic -- now, don't forget Smartmatic. They're
5 right in there. I think they're the ones that went
6 after FOX. They're not coming after me --

7 STEVE BANNON: Okay.

8 MR. LINDELL: -- because they know it --
9 they know this movie's out.

10 So I -- you know, I invite you guys, you --
11 Dominion and them, come on. Let's talk about -- you
12 know, show me what's wrong in this video, because it's a
13 hundred percent proof.

14 STEVE BANNON: Okay. Now, hang on, hang
15 on. I just want to slow down. You're saying all the
16 people like the Patrick Byrnes, all these people have
17 been discredited as being -- you know, not having facts,
18 et cetera. They're not in the film. You've got a new
19 cast of characters, experts, subject matter experts.

20 But I just want to make sure this is clear.
21 You are prepared to sit down -- and we can do it live.
22 You're prepared to sit down with Dominion executives and
23 their lawyers, have them go through this film with you
24 live, and tell you where you're defaming them, tell them
25 where you're misrepresenting, tell them where you're

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
156

1 just dead factually wrong. Is that what I'm hearing? 12:03PM

2 MR. LINDELL: Well, yeah. Because without 12:03PM
3 inviting them to, they could come -- they could come 12:03PM
4 on -- I'll go on national TV with them and look over -- 12:03PM
5 we'll go write down what I've got. 12:03PM

6 You know, when I put out in this 12:03PM
7 documentary, Steve, it's like 1/1000th of what we have. 12:03PM
8 It's 100 percent true. You're going to look at any part 12:03PM
9 of mine, you hold up, and here it is, and they're going 12:03PM
10 to go, huh-uh. 12:03PM

11 We have video of them. We have video of 12:03PM
12 their CEO and they're -- Dominion jumping in trucks and 12:03PM
13 what to do for this election. It's in the video. So I 12:03PM
14 don't think they'll show up if I invite them. 12:03PM

15 STEVE BANNON: But look, whether they show 12:03PM
16 up or not, it's their decision. They've already sued 12:03PM
17 in -- I think in federal courts all over the place. 12:04PM

18 But I just want to make clear. You're that 12:04PM
19 confident that you've got a new set of subject matter 12:04PM
20 experts, and you tie this back to actually the CCP being 12:04PM
21 involved in this, that you're that confident in what 12:04PM
22 you're putting forward, because you've told them before 12:04PM
23 you've got nothing, and I'm going to get discovery. I 12:04PM
24 just want to make sure, you're that confident that what 12:04PM
25 people are going to see is Absolute Proof, and it's only 12:04PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

157

1 1/100th of what you've got, that on a live show, you 12:04PM
2 would invite the executives of Dominion and their 12:04PM
3 lawyers to challenge you, frame by frame, and that you 12:04PM
4 could back up what you've got, and you would take on any 12:04PM
5 questions they have about how you defamed them and how 12:04PM
6 you're essentially lying about them. Is that what I'm 12:04PM
7 hearing? 12:04PM

8 MR. LINDELL: Well, first of all, you're 12:04PM
9 not defaming or lying about anything that's not true. 12:04PM
10 You know, that is true. I will bring them on. I will 12:04PM
11 do anything. All of them. 12:04PM

12 The reason they're suppressing is and the 12:04PM
13 reason they haven't sued me -- by the way, a lot of 12:04PM
14 those lawsuits are lies. They put it out there to scare 12:04PM
15 networks not to talk about it. Okay? That's what 12:05PM
16 they're doing. 12:05PM

17 And, Steve -- and they're -- and it isn't 12:05PM
18 just a different cast of experts. It's the evidence, 12:05PM
19 the hard evidence. In this -- in this documentary, 12:05PM
20 these are the facts. There's nothing subjective. 12:05PM
21 There's no subjectivity. It's all here's the facts. 12:05PM
22 Here's what happened on the first, second, third, 12:05PM
23 fourth. Here's what happened, each day, a print of what 12:05PM
24 happened. 12:05PM

25 So, yeah, Dominion, Smartmatic, both of 12:05PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
158

1 you, come on. Can we please include Smartmatic so they
2 can sue me, too?

3 STEVE BANNON: Sure. Sure. Okay. But
4 we've only got two minutes. I want to make sure that --
5 how do people -- you say it's being pulled down all over
6 the place. I think One America's got it up. One
7 America has put a logo at the bottom about how they had
8 nothing to do with it. They quoted the time.

9 MR. LINDELL: Yeah.

10 STEVE BANNON: I think it's on Gab.

11 MR. LINDELL: Yeah.

12 STEVE BANNON: How can people get -- we've
13 got two minutes. How can people see this, and
14 particularly, how can the Dominion people see it so they
15 can come back if they want and challenge you? How can
16 people get access to this?

17 MR. LINDELL: All I can say is it's on OAN.
18 It's -- you can view it 24/7. You can go to
19 michaeljlindell.com -- michaeljlindell.com, or Google my
20 name or Google Absolute Proof.

21 It all comes to that site, and they keep
22 taking stuff down, and we put -- keep putting it up.
23 We've pretty much got it now where you're going to be
24 able to watch it, we -- after we got through this
25 morning, the big attack.

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
159

1 So michaeljlindell.com, Google it. People 12:06PM
2 are putting it up everywhere, though, on social media 12:06PM
3 now, so you shouldn't have any problem. 12:06PM

4 And I want to say something. OAN -- OAN 12:06PM
5 just sold me that time, and here they took their Twitter 12:06PM
6 down yesterday. I just got a -- I got it from their -- 12:06PM
7 one of -- I heard it from one of their people. For no 12:06PM
8 reason. They hadn't even posted anything. Dominion 12:06PM
9 knew this was coming or somebody did and took their 12:06PM
10 Twitter down. 12:06PM

11 Jack Dorsey, you're the next one we'll talk 12:06PM
12 about in the next documentary. 12:06PM

13 STEVE BANNON: Okay. One last thing. But 12:06PM
14 no executive -- they sent you a letter yesterday. We've 12:06PM
15 only got a minute left. No executive of Dominion -- 12:06PM

16 MR. LINDELL: Right. 12:06PM

17 STEVE BANNON: -- has reached out to you 12:06PM
18 today. This started playing on One America at 10:00 12:07PM
19 o'clock when our show came on. When we get off, it's on 12:07PM
20 One America running in a loop. It's on Gab TV. It's 12:07PM
21 other places. 12:07PM

22 That they have not -- I just want to make 12:07PM
23 sure we're clear. They have not reached out to you yet 12:07PM
24 to talk about what you've now put in this. What you 12:07PM
25 say, you show nothing but evidence, you can back it up, 12:07PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
160

1 and you would have them come on live and actually 12:07PM
2 deconstruct the film in front of the world. They have 12:07PM
3 not reached out to you yet, correct? 12:07PM

4 MR. LINDELL: That's right. That's right. 12:07PM
5 I would love them to come on. Let's do it. We should 12:07PM
6 do it on your show, Steven. I'm open at any time. 12:07PM
7 Let's -- let's get them on. 12:07PM

8 STEVE BANNON: We would welcome. In fact, 12:07PM
9 we've reached out to the Dominion guys. I think Michael 12:07PM
10 Seals and you have spoken. We want to do this. I think 12:07PM
11 it's one of the reasons -- ways to put it to bed, have 12:07PM
12 Dominion come back and challenge. And by the way, take 12:07PM
13 it apart. That's what the democracy is about. 12:07PM

14 If you think Mike Lindell is a liar, if you 12:07PM
15 think he's a crank, if you think he's a kook, then come 12:07PM
16 on and let's do it live and let's go through it. I 12:07PM
17 think it would be fair, and I think a billion people 12:07PM
18 would watch it. 12:07PM

19 Mike, we've got to jump. You're doing 12:07PM
20 God's work. I mean, unbelievable. Mike Lindell, 12:07PM
21 ultimate honey badger. 12:07PM

22 (Clip ended.) 12:07PM

23 Q. (BY MS. WRIGLEY) Mr. Lindell, that's an 12:07PM
24 appearance you did with Steve Bannon talking about 12:08PM
25 "Absolute Proof" on February 5th -- 12:08PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
161

1 A. Uh-huh. Yes.

12:08PM

2 Q. -- 2001 [sic], correct?

12:08PM

3 A. Yes.

12:08PM

4 Q. Do you remember doing that appearance with
5 Mr. Bannon?

12:08PM

12:08PM

6 A. Yes. I did a ton of them back then, but yes.
7 Yes.

12:08PM

12:08PM

8 Q. And you specifically referenced Smartmatic in
9 that appearance with Mr. Bannon, correct?

12:08PM

12:08PM

10 A. Yes.

12:08PM

11 Q. And you called out Smartmatic?

12:08PM

12 A. Yes, I did.

12:08PM

13 Q. And you actually asked Smartmatic to sue you in
14 that appearance with Steve Bannon, right?

12:08PM

12:08PM

15 A. That's right. Just -- just like I did
16 Dominion, correct.

12:08PM

12:08PM

17 Q. Now, do you understand that Dominion and
18 Smartmatic are separate companies?

12:08PM

12:08PM

19 A. Well, the information that I had then that I
20 got that they were -- they were very much connected with
21 the -- with the software called GEMS, and also, you
22 know, what I know now and what I knew then is everything
23 has been validated as far as Smartmatic.

12:08PM

12:08PM

12:08PM

12:08PM

12:08PM

24 I learned just LA County, we got the data
25 from there, the cast vote records. Everything validated

12:08PM

12:08PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
162

1 Dennis Montgomery's data, the evidence I had there, and
2 I turned that all into Smartmatic. They have all 32
3 terabytes.

4 So at this time, they were very much tied
5 together. We had hired -- I had already hired people to
6 investigate the two of them, how they -- how they're
7 connected. Yeah. And yeah.

8 So there's -- by that time, it wasn't that
9 they were one and the same, but they were -- you could
10 throw ES&S in there, all these machines that got hacked.
11 Dominion and Smartmatic were very much in the forefront
12 at that time, probably because you guys were out running
13 around suing people.

14 Q. Okay. So at the time you did that appearance
15 with Mr. Bannon to talk about "Absolute Proof," you were
16 aware that Dominion had filed lawsuits claiming that
17 false information had been published about it in
18 connection with the 2020 election?

19 A. I was well aware of that, and that they had
20 sent threatening letters to over 250 citizens that
21 looked like Mafia letters I used to get back when I owed
22 football bets to the Mafia. These were terrible
23 letters, and I thought what an evil company. I was
24 aware of these letters. In fact, we had a lawsuit of
25 those people suing Dominion for it. And I was aware

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
163

1 that they had sued -- I think they had sued FOX by then. 12:10PM

2 I can't remember. 12:10PM

3 Actually, Smartmatic drew first blood. 12:10PM

4 Smartmatic sued Fox News on February 4th, 2021, which 12:10PM

5 changed my life forever. That's why I was very upset 12:10PM

6 with Smartmatic there. 12:10PM

7 Smartmatic, when they did that, I could 12:10PM

8 never, ever go on FOX again to sell pillows, NewMax or 12:10PM

9 anywhere. I was completely shut out of all places I 12:10PM

10 advertised before. So on Salem Media, Fox News and 12:10PM

11 NewsMax. After Smartmatic sued -- they drew first blood 12:10PM

12 in this big out lawfare, and that's where Smartmatic got 12:10PM

13 tied in. This was after February 5th, the show. 12:10PM

14 Q. Now, Mr. Lindell -- 12:10PM

15 A. So that was -- that's what I had against 12:10PM

16 Smartmatic. Now I do recall. And that's why I sued 12:10PM

17 Smartmatic. I sued Smartmatic first because of what 12:10PM

18 they did on February 4th. 12:10PM

19 Q. When you did the "Absolute Proof" documentary, 12:11PM

20 you were angry at Smartmatic for filing that lawsuit -- 12:11PM

21 A. No. 12:11PM

22 Q. -- against Fox News? 12:11PM

23 A. No. It was all part of the thing. I just 12:11PM

24 thought, well, that's pretty -- that's -- you know, 12:11PM

25 that's pretty perfect. By then, I was losing box stores 12:11PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
164

1 every day, so it didn't -- it was just all part of the 12:11PM
2 pile. 12:11PM

3 Q. Did you have an understanding of why Smartmatic 12:11PM
4 sued Fox News prior to "Absolute Proof" documentary? 12:11PM

5 A. Yeah, I had a good idea, because they were 12:11PM
6 trying to do lawfare and suppress all the information 12:11PM
7 that they were guilty. 12:11PM

8 Q. Are you aware that -- 12:11PM

9 A. A hundred percent I knew why. That's why 12:11PM
10 Smartmatic did that. They started lawfare. It hadn't 12:11PM
11 been in our country since 1792. That's why we're here 12:11PM
12 today. It's disgusting. 12:11PM

13 Q. Mr. Lindell, do you engage in lawfare? 12:11PM

14 A. What? 12:11PM

15 Q. Do you engage in lawfare? 12:11PM

16 A. No. I just have to sit and put up with all 12:11PM
17 your stuff. That's all you guys have. 12:11PM

18 Q. You sued Smartmatic first, correct? 12:11PM

19 A. I sued Smartmatic. My lawyers -- my lawyers at 12:11PM
20 the time said we're going to sue Smartmatic because -- 12:11PM
21 and -- and Dominion sued us -- so that we could bring 12:11PM
22 out the evidence to the public. I wanted to get the 12:11PM
23 evidence out, because they were suppressing it. You 12:11PM
24 guys were suppressing it. 12:11PM

25 Fox News ain't going to show it. NewsMax 12:12PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
165

1 ain't going to show it. And the Salem Media is 12:12PM
2 certainly not going to show it. And I was the only one 12:12PM
3 with the voice going, "Okay, you know what? We have to 12:12PM
4 get this evidence out there no matter what it takes." 12:12PM

5 And Smartmatic, what they did personally by 12:12PM
6 suing that and I couldn't get on those stations, the 12:12PM
7 lawyer -- this was all on the advice of con lawyers. 12:12PM

8 Q. Mr. Lindell, let me -- I just want to dig into 12:12PM
9 that a little bit. Let me ask you about going on Fox 12:12PM
10 News. 12:12PM

11 Did anybody at Fox News tell you that you 12:12PM
12 could not come on and advertise MyPillow products after 12:12PM
13 that lawsuit by Smartmatic? 12:12PM

14 A. I couldn't come on and talk about MyPillow. I 12:12PM
15 couldn't come on there at all. Before, if I do it -- if 12:12PM
16 I would do it on Fox, NewsMax or Salem Media -- those 12:12PM
17 are my three biggest outlets. 12:12PM

18 If I can't go on and talk about my 12:12PM
19 employees -- I have 4 -- 300 more employees saying we -- 12:12PM
20 and we do big segments on addiction, people -- giving 12:12PM
21 people second chances, people coming to the Lord, people 12:12PM
22 getting saved. My whole thing was all about getting 12:12PM
23 saved, about coming to Jesus for the biggest revival I 12:13PM
24 ever -- I couldn't go on those stations any more after 12:13PM
25 February 4th, what Smartmatic did to Fox News. 12:13PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

166

1 Everybody got scared. Mike Lindell's 12:13PM
2 talking about election platform. We can't have him on 12:13PM
3 even to talk about MyPillow, but -- and the same thing 12:13PM
4 with the cancelled box stores and all this stuff. I 12:13PM
5 couldn't go on after that, after you guys did what you 12:13PM
6 did because I couldn't go on and say why I was 12:13PM
7 cancelled. They wouldn't even have me on when -- "Hey, 12:13PM
8 you just lost six more box stores. Your company's in 12:13PM
9 debt and just getting plummeled [sic], and you're going 12:13PM
10 to lose your company. How do you feel?" 12:13PM

11 Well, you want to know why it's happening? 12:13PM
12 Because these companies -- well, you know, it's like I 12:13PM
13 said. This is what I said -- 12:13PM

14 THE COURT REPORTER: Will you please slow 12:13PM
15 down. 12:13PM

16 THE WITNESS: Okay. 12:13PM

17 A. I said, you know, for me at that time -- and I 12:13PM
18 think I've said it many times -- if I was a company 12:13PM
19 and I -- a pillow company out there, and everyone said 12:13PM
20 there's rocks and knives in pillows -- in MyPillow's, 12:13PM
21 number one, I wouldn't sue people. I would say no, 12:13PM
22 there's not. Look inside. Here's what I have to show. 12:13PM
23 But no company would do that. Not you guys, not 12:13PM
24 Dominion, not anyone. 12:14PM

25 And if I'd have been ES&S, I would 12:14PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
167

1 certainly have come forward and said, look at ours. 12:14PM

2 We're not suing anybody. There's no rocks or knives in 12:14PM

3 our product. But no. 12:14PM

4 ES&S, I was with them in a Senate hearing, 12:14PM

5 and you know what they said? Are your machines more 12:14PM

6 secure than Smartmatic or Dominion? He said no. All 12:14PM

7 machines have back doors and they're all vulnerable 12:14PM

8 and-- 12:14PM

9 Q. (BY MS. WRIGLEY) Mr. Lindell, let me ask you 12:14PM

10 this: By February 4, 2021, had a number of big box 12:14PM

11 stores dropped MyPillow products? 12:14PM

12 A. Yeah. Yes. 12:14PM

13 Q. Okay. 12:14PM

14 A. And this and a majority of -- 12:14PM

15 Q. And that was prior to Smartmatic filing a 12:14PM

16 lawsuit against Fox News, correct? 12:14PM

17 A. Right. That's when I was out there telling 12:14PM

18 them we got to get rid of all machines. 12:14PM

19 Q. Okay. 12:14PM

20 A. That's correct. 12:14PM

21 Q. So those decisions by the big box stores had 12:14PM

22 nothing to do with that lawsuit that Smartmatic did 12:14PM

23 against Fox News -- 12:14PM

24 (Crosstalk.) 12:14PM

25 A. No. The -- no. You guys -- you guys were 12:14PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
168

1 the -- the --

12:14PM

2 THE COURT REPORTER: I can only take one at
3 a time.

12:14PM

12:14PM

4 A. The box stores, whatever their decisions were,
5 was because I was speaking out with the election and the
6 machine. You guys specifically did all the damage, more
7 damage because I couldn't go on my -- the revenue that
8 you cost us because I could no longer go on Salem Media,
9 it was huge.

12:14PM

12:14PM

12:14PM

12:14PM

12:15PM

12:15PM

10 I was on podcasts all the time
11 talking about MyPillow and talking about our policies
12 there. I'm giving people -- it's the American dream on
13 steroids. I was an ex-crack addict. We -- this -- I
14 would go on there and tell story after story, and we
15 would sell product just talking about God and talking
16 about our employees. The American dream. Everything
17 made here, I could not do that after February 4th to
18 this day because of what you guys did.

12:15PM

12:15PM

12:15PM

12:15PM

12:15PM

12:15PM

12:15PM

12:15PM

12:15PM

19 Q. (BY MS. WRIGLEY) In 2021, did MyPillow spend
20 money on advertising?

12:15PM

12:15PM

21 A. We spend money every year on advertising.

12:15PM

22 Q. Okay. And so MyPillow was still able to
23 advertise their products on podcasts in 2021, correct,
24 sir?

12:15PM

12:15PM

12:15PM

25 A. That's correct.

12:15PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
169

1 Q. Okay.

12:15PM

2 A. And we were still able to advertise on CNN, on
3 FOX, on everybody, yes.

12:15PM

12:15PM

4 Q. In 2021, correct?

12:15PM

5 A. Yes.

12:15PM

6 Q. So you were still able to pay for TV stations
7 and revenue splits with podcasters and radio stations to
8 advertise MyPillow products after Smartmatic filed that
9 lawsuit --

12:15PM

12:15PM

12:15PM

12:15PM

10 A. Oh, no.

12:15PM

11 Q. -- against FOX?

12:15PM

12 A. A lot of -- a lot of podcasters dropped us
13 because of what you guys did.

12:15PM

12:15PM

14 Q. Mr. Lindell, just before we keep going, I would
15 just ask that we slow down a little bit.

12:15PM

12:16PM

16 A. Okay.

12:16PM

17 Q. We're talking past each other. So let's just
18 slow down. Listen to my questions. Okay?

12:16PM

12:16PM

19 A. That's not -- okay. That's not true. A lot of
20 podcasters dropped us after you guys sued FOX.

12:16PM

12:16PM

21 Q. Okay.

12:16PM

22 A. A lot of them did, couldn't --

12:16PM

23 Q. And did they drop you because they were nervous
24 that you were going to come on and accuse Smartmatic of
25 rigging the 2020 election, sir?

12:16PM

12:16PM

12:16PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

170

1 A. No. I'm -- you've asked me a -- I'm talking
2 about the appearances. I'm talking about -- you said
3 just buy ads. I -- they wouldn't do the ads any more,
4 the ads. Not Dominion making an appearance. You guys
5 put the kibosh on that.

6 And of course, they would not let me come
7 on and talk about -- when I would go on and tell them
8 about my employees and stuff, our sales would skyrocket.
9 That was all destroyed, and it has been.

10 The money that's cost us now is in the
11 hundreds of millions, probably, hundred -- at least a
12 hundred million. All the -- all of the media, I could
13 not go on there and tell. It's like a story. When you
14 tell that, your sales go up for a month, and I couldn't
15 do that.

16 But you also caused for podcasters,
17 especially on Salem Media, that -- these TV shows and
18 podcasters, and I would say half of them dropped us from
19 even doing their MyPillow reads because they were afraid
20 of getting sued just for doing MyPillow reads.

21 I had some podcaster go, well, I can't do
22 your reads any more, Mike. We can't do MyPillow
23 because, you know, we could get sued, too, because look
24 at the -- and I hadn't been sued yet.

25 Q. Mr. Lindell, did you do the documentary series

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

171

1 "Absolute Proof," "Absolute Interference" --

12:17PM

2 A. Yeah.

12:17PM

3 Q. -- "Scientific Proof" in 2021 to get back at
4 Smartmatic because of the lawsuit you're talking about?

12:17PM

5 A. Absolutely not. I did it to save our country
6 and to get rid of these electronic voting machines and
7 go to paper ballots hand counted. Hundred percent,
8 every single -- it didn't matter what happened. That's
9 exactly what I did, 18 hours a day for three years.

12:17PM

12:17PM

12:17PM

12:17PM

12:17PM

10 Q. Okay. After that appearance that we watched on
11 Steve Bannon and War Room show from February 5th, did
12 you appear again on Steve Bannon's War Room --

12:17PM

12:17PM

12:17PM

12:17PM

13 A. I have no --

12:17PM

14 Q. -- to talk about "Absolute Proof"?

12:17PM

15 A. -- no -- I have no idea.

12:17PM

16 Q. Okay. I'm going to show you another video
17 clip, sir.

12:17PM

12:18PM

18 A. Okay.

12:18PM

19 MS. WRIGLEY: This one's going to be marked
20 as Exhibit 598.

12:18PM

12:18PM

21 (Exhibit 598 marked.)

12:18PM

22 Q. (BY MS. WRIGLEY) This is a clip from the
23 February 6, 2021 Steve Bannon's War Room show. This one
24 should be just a couple minutes. So I'll let my
25 colleague get that set up, and then we'll watch it, and

12:18PM

12:18PM

12:18PM

12:18PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

172

1 I'll ask you some questions about it. 12:18PM

2 (Clip of Steve Bannon and Mike Lindell.) 12:18PM

3 STEVE BANNON: And the disclaimer is -- and 12:18PM

4 I'd like to just talk a second about that disclaimer. I 12:18PM

5 take it since you bought the time, did you want the 12:18PM

6 disclaimer up? Did you talk to the One America guys? 12:18PM

7 Is that really your -- did you drive that to make sure 12:18PM

8 that disclaimer was up there? 12:18PM

9 MR. LINDELL: No. I -- again, I said 12:18PM

10 whatever you guys need to do because, you know, at least 12:18PM

11 they're brave enough to go out there and put this out 12:18PM

12 there, because you have places -- every other cable 12:18PM

13 comp -- cable channel is not going to put this out there 12:18PM

14 because why? Because Smartmatic and Dominion sued them 12:18PM

15 or threatened to sue them. I mean, it's now funny that 12:18PM

16 they have perfect timing that Smartmatic comes in, sues 12:19PM

17 FOX yesterday and gets rid of Lou Dobbs. 12:19PM

18 I mean, this is just -- it's -- how brave 12:19PM

19 of OAN to do that. And I said, you know, put something 12:19PM

20 out there so it protects you and so that they know it's 12:19PM

21 coming from me. It doesn't mean the evidence is -- the 12:19PM

22 evidence is one hundred percent true. That's why it's 12:19PM

23 called "Absolute Proof." 12:19PM

24 STEVE BANNON: Okay. 12:19PM

25 (Clip ends.) 12:19PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

173

1 Q. (BY MS. WRIGLEY) Do you recall appearing on 12:19PM
2 Steve Bannon's podcast to talk again about "Absolute 12:19PM
3 Proof" documentary and Smartmatic? 12:19PM

4 A. No. No. But I did. It's a -- you mean 12:19PM
5 this -- 12:19PM

6 Q. And was that your voice, Mr. Lindell? 12:19PM

7 A. Yes. 12:19PM

8 Q. Okay. And that was Mr. Bannon's voice? 12:19PM

9 A. Yeah. 12:19PM

10 Q. Okay. And you referenced Smartmatic -- 12:19PM

11 A. Uh-huh. 12:19PM

12 Q. -- in connection with that appearance, correct? 12:19PM

13 A. (Witness indicated by nodding his head 12:19PM
14 affirmatively.) 12:19PM

15 Q. Okay. I'm going to show you another clip from 12:19PM
16 that same show. This is just a couple minutes. And 12:19PM
17 again, this is the Bannon's War Room from February 6, 12:19PM
18 2021. 12:19PM

19 MS. WRIGLEY: This one will be marked 12:19PM
20 Exhibit 599. 12:19PM

21 (Exhibit 599 marked.) 12:19PM

22 (Clip of Steve Bannon and Mike Lindell.) 12:19PM

23 MR. LINDELL: Right. But you're incorrect 12:20PM
24 on one thing. Dominion has not sued me. I don't even 12:20PM
25 think they've threatened to sue me. They've sent me 12:20PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
174

1 letters like, Mike, in your documentary, a few of these 12:20PM
2 people in there, this isn't real. John, let us know 12:20PM
3 who's going to be in your documentary. So I -- my reach 12:20PM
4 out is -- and then I got the other letter that said you 12:20PM
5 have been warned, you know, like I'm -- some Mafia 12:20PM
6 letter from back when I was a kid, you know. So they 12:20PM
7 don't -- they haven't sued me, Steve. 12:20PM

8 Here's the deal. I will take them. You're 12:20PM
9 exactly right. Bring the media there. I don't care how 12:20PM
10 long. I'll sit there for a week with you. We'll do it 12:20PM
11 every day. We'll make it like a little trial thing. 12:20PM

12 Because if you don't, let me tell you what 12:20PM
13 I'm doing, I am going after Dominion and Smartmatic. 12:20PM
14 I'm going after them with a lawsuit if this does not 12:20PM
15 come out to the public and they all get exposed and 12:21PM
16 then -- and show what happened in our election, because 12:21PM
17 it's going to get out there or my next step is I sue 12:21PM
18 Dominion, and when I sue Dominion, it has to come out in 12:21PM
19 court. And I'll make sure that that's public. So 12:21PM
20 either do it now -- let's just do it now and save time. 12:21PM
21 How about it, Dominion? How about it? 12:21PM

22 STEVE BANNON: So can I ask you, Mike, what 12:21PM
23 would you sue -- what grounds would you sue Dominion and 12:21PM
24 Smartmatic on? You said you're going to sue them. What 12:21PM
25 grounds -- we've got about a minute, and then we'll hold 12:21PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
175

1 you over the break. What grounds would you sue them on? 12:21PM

2 MR. LINDELL: I guess -- you know, I don't 12:21PM
3 know that yet. It would be crimes against our country 12:21PM
4 that they used their -- that they -- lies, you know, 12:21PM
5 their machines were all online. We've got them saying 12:21PM
6 they don't go online, and they -- it's right in their 12:21PM
7 manual that they go online. We've got proof that they 12:21PM
8 were online. We've got all the evidence. 12:21PM

9 So it would be a -- you know, I don't know. 12:21PM
10 I actually have lawyers looking at that right now, what 12:21PM
11 can be charged. In fact, Steve, the next time I'm on 12:21PM
12 your show, I guarantee you I'll have those charges 12:21PM
13 against Dominion, so... 12:22PM

14 (Clip ends.) 12:22PM

15 Q. (BY MS. WRIGLEY) Mr. Lindell, do you recall 12:22PM
16 appearing and having that discussion with Mr. Bannon on 12:22PM
17 his War Room podcast? 12:22PM

18 A. That's my voice. 12:22PM

19 Q. Okay. And that was Mr. Bannon's voice? 12:22PM

20 A. Yes. 12:22PM

21 Q. Okay. And as part of that appearance, you 12:22PM
22 discussed Smartmatic, correct? 12:22PM

23 A. Yes. 12:22PM

24 Q. And you also discussed Dominion, correct? 12:22PM

25 A. Yes. 12:22PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
176

1 Q. You asked Dominion -- or you expressed interest 12:22PM
2 in having -- in suing Dominion, correct? 12:22PM

3 A. Uh-huh. 12:22PM

4 Q. You expressed interest in suing Smartmatic, 12:22PM
5 correct? 12:22PM

6 A. Yes. 12:22PM

7 Q. Okay. 12:22PM

8 A. Got to get the evidence out, correct. 12:22PM

9 Q. Okay. And you identified Smartmatic as being 12:22PM
10 involved in crimes against our country, correct? 12:22PM

11 A. That's right. 12:22PM

12 Q. And you did, in fact, later file a lawsuit 12:22PM
13 against Smartmatic, correct? 12:22PM

14 A. That's correct. 12:22PM

15 Q. And at that point in time, Smartmatic had not 12:22PM
16 sued you, correct? 12:22PM

17 A. That's correct. 12:22PM

18 Q. Had Smartmatic sent any what you call 12:22PM
19 threatening letters against you, Mr. Lindell? 12:22PM

20 A. No. They just hurt MyPillow. In fact, it was 12:22PM
21 crushing my company. 12:22PM

22 Q. And when you say "hurt MyPillow," you mean 12:22PM
23 by -- on February 4th, two days before those podcasts, 12:22PM
24 filing a lawsuit -- 12:23PM

25 A. Started lawfare. 12:23PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

177

1	Q. -- against Fox News, correct?	12:23PM
2	A. That's correct.	12:23PM
3	Q. Lawfare, right?	12:23PM
4	A. Uh-huh. Uh-huh.	12:23PM
5	Q. But in this podcast, you're actually also	12:23PM
6	talking about engaging in lawfare, too, correct, sir?	12:23PM
7	A. No.	12:23PM
8	Q. I mean, lawfare is filing a lawsuit, right?	12:23PM
9	A. Oh. Is that what you call it?	12:23PM
10	Q. That's what I'm asking you.	12:23PM
11	A. Lawfare is going after people and running them	12:23PM
12	out of money so they're afraid to get sued, so they	12:23PM
13	cower down. I've been involved in this -- you guys have	12:23PM
14	ran MyPillow dry. You've ran Mike Lindell dry. You've	12:23PM
15	ran other companies dry. That's your game you play.	12:23PM
16	I was just involved -- you see me call that	12:23PM
17	other lawyer a whatever. That was done because that --	12:23PM
18	Q. I don't think there's a need for that,	12:23PM
19	Mr. Lindell.	12:23PM
20	A. -- that was because -- because back then this	12:23PM
21	judge made a thing -- this Judge Wang, nine months --	12:23PM
22	she made it go nine months where I spent money on	12:23PM
23	discovery and going to trial and all this stuff.	12:23PM
24	Instead, we had put in for a dismissal, and she didn't	12:23PM
25	rule on that. She decided to sit back.	12:23PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
178

1 Well, if I didn't have the resources, some 12:23PM
2 little guy is going to be ran out of money, and that's 12:23PM
3 not our justice system. And I called her out on it, and 12:24PM
4 she made a ruling. At least rule for me or against me, 12:24PM
5 but make a ruling. Don't sit back like a judge, like a 12:24PM
6 coward, and go I'm not going to make a ruling or what 12:24PM
7 their -- her agenda was. I don't know. 12:24PM

8 Q. Mr. Lindell -- 12:24PM

9 A. But this is lawfare. What you guys do, you 12:24PM
10 attack businesses. Instead of opening up your machines 12:24PM
11 and saying nothing to hide here. 12:24PM

12 Now I have everything. Now over the three 12:24PM
13 years you've attacked me, we got cast vote records on 12:24PM
14 Smartmatic. We have every evidence known to man on 12:24PM
15 Smartmatic. You guys should just walk away and say 12:24PM
16 sorry. 12:24PM

17 Q. Mr. Lindell, let me ask you this: Do you think 12:24PM
18 private companies or citizens have a right to file a 12:24PM
19 lawsuit accusing people of making false and defamatory 12:24PM
20 statements about them? 12:24PM

21 A. What are you -- what are you talking about? Do 12:24PM
22 I know... 12:24PM

23 Q. Do you think private companies or private 12:24PM
24 citizens have a right to file a lawsuit in this 12:24PM
25 country -- 12:24PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

179

1 A. Are you a private company? You work for our
2 government.

3 Q. -- accusing people of making false --

4 A. You're a government company.

5 Q. I'm going to ask you not to interrupt me, sir.

6 A. Yeah.

7 Q. Do you think private companies or private
8 citizens have a right in this country to file a lawsuit
9 for -- against people making false and defamatory
10 statements about them?

11 A. That -- I will say that if it's -- if it's the
12 right situation, but if the statements are true, they
13 should be able to have dismissals, and that's what
14 dismissals are for.

15 And also -- and you're not a private
16 company, if you're referring to yourself. Smartmatic is
17 working for the government. These are -- we pay for
18 these machines. I do as a taxpayer. You are a
19 government entity as far as I'm concerned. I have every
20 right to question you. I have every right to talk to
21 the public about it, and you do not have the right to do
22 lawfare against our citizens. You should have opened up
23 your machines and said nothing to hide here, but you
24 can't. You can't.

25 Q. Mr. Lindell, have you ever lived in Los Angeles

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
180

1 County, California?

12:25PM

2 A. I've been there many, many, many times.

12:25PM

3 Q. Have you lived there, sir?

12:25PM

4 A. I have not lived there.

12:25PM

5 Q. Are you a taxpayer in Los Angeles County,
6 California?

12:25PM

7 A. No.

12:26PM

8 Q. Okay. Let me ask you --

12:26PM

9 A. Did I pay money in LA County? Yes.

12:26PM

10 Q. Let me ask you this: In both of the shows that
11 we watched from the War Room, the one on February 5th
12 and then the couple of clips from February 6th, do you
13 recall that you and Mr. Bannon talked about you
14 receiving letters from Dominion?

12:26PM

12:26PM

12:26PM

12:26PM

12:26PM

15 A. Yes.

12:26PM

16 Q. Okay. By February 5th, 2021, had you received
17 a number of letters from Dominion's lawyers relating to
18 statements that you were making about Dominion in the
19 public?

12:26PM

12:26PM

12:26PM

12:26PM

20 A. No. I had -- I believe I had one letter that
21 came in December or Jan -- February -- January. It was
22 the same form letter. A whole mass of people got --
23 from poll watchers and everything. It was almost like a
24 form letter.

12:26PM

12:26PM

12:26PM

12:26PM

12:26PM

25 And then the other letter I got, I believe

12:26PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
181

1 it was before "Absolute Proof," and that said anything 12:26PM
2 you put in this or -- it could have came after. It 12:26PM
3 listed all the people, Sidney Powell, Rudy Giuliani. It 12:27PM
4 listed people, that these guys are not -- these are not 12:27PM
5 true what they said. Not one of the people they listed 12:27PM
6 on that letter was in my documentary. 12:27PM

7 Q. Now, after "Absolute Proof," you filed a 12:27PM
8 lawsuit against Smartmatic, correct? 12:27PM

9 A. I don't know when it was. I don't -- the 12:27PM
10 lawyers did that. To be honest with you, I was too busy 12:27PM
11 doing my own things trying to -- 18 hours a day trying 12:27PM
12 to get the word out about these machines. 12:27PM

13 Q. You are aware, though, that claims were made 12:27PM
14 against Smartmatic in a federal lawsuit by you? 12:27PM

15 A. Yes. 12:27PM

16 Q. Okay. 12:27PM

17 A. There was all these lawyers. I wasn't even 12:27PM
18 involved in the decision on that, to be honest with you. 12:27PM

19 Q. Now, are you aware that a federal court 12:27PM
20 dismissed those claims that you brought against 12:27PM
21 Smartmatic, sir? 12:27PM

22 A. Yes. And that was done on the second day of 12:27PM
23 the Cyber Symposium. What a -- what timing. Whoa, 12:27PM
24 that's weird. 12:27PM

25 Q. Mr. Lindell, are you accusing the federal judge 12:27PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
182

1 in that case of doing something suspicious? 12:28PM

2 A. It's very suspicious. 12:28PM

3 Q. You're -- you are accusing Judge Nichols in 12:28PM
4 the -- 12:28PM

5 (Crosstalk.) 12:28PM

6 A. It's very suspicious. The timing was very 12:28PM
7 suspicious, yeah. 12:28PM

8 Q. (BY MS. WRIGLEY) Okay. 12:28PM

9 A. I answered your question. 12:28PM

10 Q. Are you aware that the federal court in that 12:28PM
11 case where you brought claims against Smartmatic also 12:28PM
12 found that some of the claims you filed against 12:28PM
13 Smartmatic were frivolous? 12:28PM

14 A. That's his opinion. 12:28PM

15 Q. Okay. Now, in those appearances, do you 12:28PM
16 recall -- with Mr. Bannon, do you recall discussing a 12:28PM
17 disclaimer that OAN put up in connection with "Absolute 12:28PM
18 Proof"? 12:28PM

19 A. Yes. As I found out about it, yeah. 12:28PM

20 Q. Okay. I'm going to hand you an Exhibit 600, 12:28PM
21 Mr. Lindell. 12:28PM

22 (Exhibit 600 marked.) 12:28PM

23 Q. (BY MS. WRIGLEY) And I'll represent this is a 12:28PM
24 screenshot of that disclaimer that was put up relating 12:28PM
25 to "Absolute Proof." 12:28PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
183

1	MR. KACHOUROFF: Is there an exhibit	12:29PM
2	number, Nicole?	12:29PM
3	MS. WRIGLEY: 600.	12:29PM
4	MR. KACHOUROFF: Sorry.	12:29PM
5	A. Did you guys sue OAN?	12:29PM
6	Q. (BY MS. WRIGLEY) Mr. Lindell, do you see with	12:29PM
7	respect to this disclaimer it states, "Michael James	12:29PM
8	Lindell has purchased the airtime for the broadcast of	12:29PM
9	its program on One America News Network. Mr. Lindell is	12:29PM
10	the sole author and executive producer of this program	12:29PM
11	and is solely and exclusively responsible for its	12:29PM
12	content. The topic of this broadcast is the 2020	12:29PM
13	election. OAN has undertaken its own reporting on this	12:29PM
14	topic. This program is not the product of OAN's	12:29PM
15	reporting. The views, opinions and claims expressed in	12:29PM
16	this program by Mr. Lindell and other guests,	12:29PM
17	presenters, producers or advertisers are theirs and	12:29PM
18	theirs alone and are not adopted or endorsed by OAN or	12:29PM
19	its owners. In particular, OAN does not adopt or	12:29PM
20	endorse any statements or opinions in this program	12:29PM
21	regarding the following entities or people: US	12:29PM
22	Dominion, Inc. and any related entities, Smartmatic USA	12:29PM
23	Corp., Brian Kemp, Brad Raffensperger or Gabriel	12:30PM
24	Sterling. Further, the statements and claims expressed	12:30PM
25	in this program are presented at this time as opinions	12:30PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
184

1 only and are not intended to be taken or interpreted by 12:30PM
2 the viewer as established facts. The results in the 12:30PM
3 2020 presidential election remain disputed and 12:30PM
4 questioned by millions of Americans who are entitled to 12:30PM
5 hear from all sides in order to help determine what may 12:30PM
6 have happened." 12:30PM

7 Do you see that? 12:30PM

8 A. Uh-huh. 12:30PM

9 Q. And were you aware that OAN put up this 12:30PM
10 disclaimer when it aired "Absolute Proof"? 12:30PM

11 A. I believe it was after you sued FOX on 12:30PM
12 February 4th that they let me know that they were going 12:30PM
13 to put this on there. 12:30PM

14 Q. And then prior to your other documentaries, you 12:30PM
15 had read this disclaimer, correct, sir? 12:30PM

16 A. For -- for OAN. OAN didn't have any other 12:30PM
17 ones. 12:30PM

18 Q. Okay. How much did you pay OAN to air 12:30PM
19 "Absolute Proof" on its network? 12:30PM

20 A. I have no idea. 12:30PM

21 Q. Do you have records that would show how much 12:30PM
22 OAN was paid to air "Absolute Proof"? 12:30PM

23 A. I have no idea. 12:31PM

24 Q. Did you pay that from your own personal 12:31PM
25 finances or did OAN get paid by MyPillow or any other 12:31PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
185

1 company?

12:31PM

2 A. No. No. OAN, their ads would be MyPillow. If
3 this was on the -- anything -- anything to do with the
4 election stuff came right out of Mike Lindell's pocket.

12:31PM

12:31PM

12:31PM

5 Q. Okay. So you, Mike Lindell, paid for OAN to
6 broadcast the "Absolute Proof" documentary on its
7 network?

12:31PM

12:31PM

12:31PM

8 A. That would be -- that would be correct.

12:31PM

9 Q. Okay. Okay. Now, after taping "Absolute
10 Proof," you continued to promote the documentary with
11 media?

12:31PM

12:31PM

12:31PM

12 A. I could promote it anywhere.

12:31PM

13 Q. You promoted it with Steve Bannon on War Room
14 podcasts, correct?

12:31PM

12:31PM

15 A. That would be a place -- the only place I could
16 talk, because you guys put the kibosh on that.

12:31PM

12:31PM

17 Q. Okay. All right, sir. Let's look at -- I'm
18 going to mark another video, and we'll look at another
19 one. This has been previously marked as DEF
20 Exhibit 435.

12:31PM

12:31PM

12:31PM

12:32PM

21 And for the record, this is a February 8,
22 2021 video from Real America with Dan Ball, who appears
23 on the OAN network.

12:32PM

12:32PM

12:32PM

24 Do you know who Dan Ball is, Mr. Lindell?

12:32PM

25 A. I met him once.

12:32PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024

186

1 Q. Have you appeared on his Real America show? 12:32PM

2 A. I guess. If you show me, then I have. 12:32PM

3 Q. Do you recall as you sit here right now, 12:32PM

4 Mr. Lindell? 12:32PM

5 A. What's that? 12:32PM

6 Q. Do you recall if you've appeared on his show? 12:32PM

7 A. I know the name. I don't know. We'll have to 12:32PM

8 see if I'm on there. 12:32PM

9 Q. Okay. I'm going to play Exhibit 435 now. This 12:32PM
10 one's about seven minutes, so everybody knows. 12:32PM

11 (Clip of Dan Ball and Mike Lindell.) 12:32PM

12 DAN BALL: Welcome back. Time now to Get 12:32PM
13 Real. It's a Friday. Once again, we're going to jingle 12:32PM
14 things up. I invited somebody on to help me out, and in 12:32PM
15 this Get Real, we're going to get real about the term 12:32PM
16 "election fraud," because if you say it now, the 12:32PM
17 election's over, people attack you. Twitter, Facebook, 12:32PM
18 Instagram bans you. Your friends, your -- maybe your 12:32PM
19 friends, strangers, who knows, co-workers will dock you, 12:32PM
20 right? You can't say the phrase. 12:32PM

21 So if you've been watching OAN, and right 12:32PM
22 before this program, you saw a special documentary that 12:33PM
23 was produced by the CEO of MyPillow, Mike Lindell. He 12:33PM
24 put a lot of money, put lots of time into this. He went 12:33PM
25 around the nation collecting evidence that he believes 12:33PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
187

1 proves there was voter fraud and election fraud. 12:33PM

2 Whether you believe it or not, and we know 12:33PM
3 what the Left's going to say, oh, you're inciting 12:33PM
4 violence by even saying the phrase. No, I think in 12:33PM
5 America, you still have free speech. 12:33PM

6 So anybody to the Left that says that OAN 12:33PM
7 shouldn't be airing this or that we shouldn't even use 12:33PM
8 the phrase or term "election fraud," sorry. It's called 12:33PM
9 free speech. 12:33PM

10 So joining me now is CEO of MyPillow, Mike 12:33PM
11 Lindell, to wrap our show up today. Mike, we're going 12:33PM
12 to be airing this "Absolute Proof" two-hour documentary. 12:33PM
13 It just aired before this program, and it's going to air 12:33PM
14 all weekend long. 12:33PM

15 You paid for this. These aren't the views 12:33PM
16 we're expressing on this network, but my opinion is, my 12:33PM
17 personal ones, Dan Ball, the host, because I can an 12:33PM
18 opinion, it's called free speech, is that yeah, there 12:33PM
19 was election and voter fraud. 12:33PM

20 The major networks even said there was, 12:33PM
21 they just said not enough to overturn it. But that's 12:33PM
22 the question. We don't know if there's enough because 12:34PM
23 they've never let us investigate and see the servers and 12:34PM
24 see the machines and see the ballots and the envelopes. 12:34PM
25 So tell folks if they didn't view it yet what they're 12:34PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
188

1 going to see in this two-hour documentary that you
2 produced.

3 MR. LINDELL: What they're going to see is
4 something they've never heard before and never seen, and
5 that's cyber forensics footprints. They're going to
6 have -- they're going to see in there what -- which
7 country it came from, the ID of the computer, the IP
8 address where it came over here. They have IP address
9 in their computer it broke into here, the actual ID
10 number of the computer, and then how many votes were
11 flipped, whether they got Internet.

12 It's a cyber footprint. It's what the
13 government uses when they -- if you did an
14 investigation, this is what you'd be looking for for
15 that time.

16 We have them from November 1st all the way
17 through the election. It shows the -- a massive attack
18 on our country by China and other countries. China did
19 60 percent of this.

20 It was all done through Dominion machines
21 and Smartmatic machines. That was the tool they used.
22 And you know, you said it before there right at the top
23 of the show here. Since I've launched this today,
24 YouTube took it down, Vimeo took it down. Google put
25 out this story, this -- this Hogg story about inventing

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
189

1 a pillow or something, we're coming up with a bill to 12:35PM
2 suppress all the -- if you search my lindellrecover -- 12:35PM
3 or michaeljlindell.com where we put up the site, what 12:35PM
4 they do is they push that down so you don't see it -- 12:35PM

5 DAN BALL: Uh-huh. 12:35PM

6 MR. LINDELL: -- but I just bought their 12:35PM
7 add- -- I just bought their address. I mean, we're 12:35PM
8 putting new stuff up. You can't suppress it. 12:35PM

9 Ten million people so far have watched this 12:35PM
10 documentary around the world. They're telling me over 12:35PM
11 in Australia and stuff, they're even trying to take it 12:35PM
12 down there. What? That's kind of strange, huh? 12:35PM

13 DAN BALL: Yeah. 12:35PM

14 MR. LINDELL: You know, but you -- you 12:35PM
15 watch this and you will -- by the -- you watch this, you 12:35PM
16 will see -- you'll see the experts that were there, the 12:35PM
17 government insiders that were there, generals, colonels. 12:35PM
18 These guys are all there. 12:36PM

19 These were -- this evidence came out very 12:36PM
20 late. I came -- I got a -- I just got it January 9th. 12:36PM
21 You know, January 9th. That's why they're going, well, 12:36PM
22 why did this come out late? Because we all know the 12:36PM
23 election was stole, it's just that they kept this down. 12:36PM

24 And boy, you mention a machine, it's like, 12:36PM
25 what? And I've told Dominion, sue me, you know. Now 12:36PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
190

1 it's too late. Everybody knows about it now, so -- 12:36PM

2 DAN BALL: Well, yeah, they just sued FOX 12:36PM
3 for -- FOX and some of their hosts, like that do what I 12:36PM
4 do, talks shows, for 2.7 billion yesterday, coming out 12:36PM
5 of Smartmatic, right, and Dominion because they're 12:36PM
6 pissed off? 12:36PM

7 MR. LINDELL: No. No. No. No. That's 12:36PM
8 fake. What -- that's fake. I guarantee you they didn't 12:36PM
9 sue them. That's all smoke and mirrors. That's to 12:36PM
10 scare other people not to talk about Dominion and 12:36PM
11 Smartmatic. 12:36PM

12 DAN BALL: Uh-huh. 12:36PM

13 MR. LINDELL: Did you see the lawsuit? Did 12:36PM
14 anybody see it? You know, everybody that I could -- 12:36PM
15 Dominion hasn't sued me. They go, oh, Mike, they're 12:36PM
16 suing you. No, they don't. 12:36PM

17 Yesterday, Dominion, they sent me a letter, 12:36PM
18 and they said, now, if you're going to have these people 12:37PM
19 in your documentary, these have all been discredited. 12:37PM
20 Not one person is in my documentary that was on that 12:37PM
21 list. 12:37PM

22 So anybody out there, this is real 12:37PM
23 evidence, 100 percent proof. I wouldn't be doing all 12:37PM
24 this if I -- if I thought it wasn't a hundred percent. 12:37PM
25 It's a hundred percent. 12:37PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
191

1 DAN BALL: Yeah. 12:37PM

2 MR. LINDELL: Just go watch the -- watch it 12:37PM

3 on your show, watch it on OAN. 12:37PM

4 DAN BALL: So Mike, all we could do -- and 12:37PM

5 we read a promo today just saying it was going to be on 12:37PM

6 our air, and they -- they suspended our Twitter account 12:37PM

7 for 12 hours. I think it's back up now. But it was 12:37PM

8 down for 12 hours just because we put an ad saying that 12:37PM

9 you bought time, you're running this documentary, it's 12:37PM

10 all you, and we put it on Twitter and bang, we got 12:37PM

11 suspended, and they said because it could incite 12:37PM

12 violence. That was their excuse, it could incite 12:37PM

13 violence. 12:37PM

14 MR. LINDELL: Incite violence. 12:37PM

15 DAN BALL: I've got to end with this. You 12:37PM

16 briefly touched on it right here. David Hogg. I'm not 12:37PM

17 going to say anything about this young man that is 12:37PM

18 negative because he was at the school when the shooting 12:37PM

19 happened in Parkland, but he has become a big activist, 12:37PM

20 a big antigun guy, there's a picture of him, and you 12:38PM

21 just mentioned it. He now all of the sudden yesterday 12:38PM

22 said he's going to start a pillow company to combat your 12:38PM

23 pillow company. 12:38PM

24 MR. LINDELL: No. No. Guys, no. Don't 12:38PM

25 even give him air time. That's not him. They're doing 12:38PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
192

1 this to suppress the truth of --

12:38PM

2 DAN BALL: Right. Right.

12:38PM

3 MR. LINDELL: -- all of the elections.

12:38PM

4 DAN BALL: That's what I want you to get
5 out there, that it's fake.

12:38PM

12:38PM

6 MR. LINDELL: What they're doing is fake.

12:38PM

7 He's not doing that. I'm not even giving it time. I

12:38PM

8 haven't even responded. Nobody should. It's fake.

12:38PM

9 He's -- that's just so they push down the big story is,

12:38PM

10 guess what, 100 percent, we have the election fraud.

12:38PM

11 Watch my -- watch my video, the -- watch my

12:38PM

12 documentary, and you too will go, what? And what are --

12:38PM

13 what are people going to do about it? Because this

12:38PM

14 is -- you -- there's no statute of limitations on

12:38PM

15 something about a crime against humanity. That's what

12:38PM

16 this was. The whole world is watching.

12:38PM

17 DAN BALL: Yep. All right. It is

12:38PM

18 "Absolute Proof." It's going to air several times on

12:38PM

19 the OAN network. Again, Mike Lindell produced it,

12:38PM

20 solely, put it out there.

12:38PM

21 And like I said, Mike, the reason I invited

12:38PM

22 you on, I'm not going to read some statement like

12:38PM

23 NewsMax did or get up and walk off because I don't agree

12:39PM

24 with you, because that's a bunch of crap. If you can't

12:39PM

25 stand the heat, get out of the kitchen, Mr. Sellers.

12:39PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
193

1 I commend you for pushing forward and -- 12:39PM
2 with your right to free speech. So I want to watch this 12:39PM
3 weekend, and we'll chat next week as well. 12:39PM
4 Mike, you take care. Have a good weekend. 12:39PM
5 Okay? 12:39PM
6 MR. LINDELL: Yeah. Thank you. Thanks, 12:39PM
7 guys. God bless. Thanks. 12:39PM
8 DAN BALL: All right. And there you go. 12:39PM
9 Let's keep it real and get real, right? Get real. 12:39PM
10 There was voter election fraud. How much? 12:39PM
11 Was it enough to change the election? Watch the 12:39PM
12 documentary. You decide. That's what we're about here 12:39PM
13 at OAN, free speech and free thought, unlike those other 12:39PM
14 mainstream media corporate lap dogs. 12:39PM
15 You have a great weekend. Relax, take it 12:39PM
16 easy. We're back here Monday. See you at 5:00 p.m., 12:39PM
17 8:00 p.m. Pacific. Until then, folks, remember: Be 12:39PM
18 proud, be safe, and God bless. 12:39PM
19 (Clip ends.) 12:39PM
20 Q. (BY MS. WRIGLEY) Mr. Lindell, do you recall 12:39PM
21 doing that appearance with Dan Ball on Real America on 12:39PM
22 the OAN network talking about Absolute Proof? 12:39PM
23 A. Yeah. And I believe that was February 5th. 12:39PM
24 You said 8th before. It wasn't the 5th [sic], it was 12:40PM
25 the 5th. 12:40PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
194

1 Q. The 5th of February.

12:40PM

2 A. Not the 8th. Yeah.

12:40PM

3 Q. So around the same day that you --

12:40PM

4 A. Yeah.

12:40PM

5 Q. -- put out Absolute Proof?

12:40PM

6 A. Yeah, the same day. Yeah.

12:40PM

7 Q. Okay. And in that appearance with Dan Ball on

12:40PM

8 the Real America show, you specifically mentioned that

12:40PM

9 the election fraud was done through the Smartmatic

12:40PM

10 machines, correct?

12:40PM

11 A. Yeah. They were added in there, yep.

12:40PM

12 Q. And you indicated that you had a hundred

12:40PM

13 percent proof of that, correct?

12:40PM

14 A. That's correct.

12:40PM

15 Q. Okay. And you also indicated that the

12:40PM

16 "Absolute Proof" documentary had seen by 10 million

12:40PM

17 people around the world, correct?

12:40PM

18 A. Yeah.

12:40PM

19 Q. Now, did you do a discussion or a screening

12:40PM

20 with Steve Bannon about "Absolute Proof" in addition to

12:40PM

21 the War Room podcast appearances?

12:40PM

22 A. What do you mean?

12:40PM

23 Q. Did you introduce a screening of "Absolute

12:40PM

24 Proof" with Mr. Bannon on OAN?

12:40PM

25 A. Yeah. He was -- he -- he was -- we wanted

12:40PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
195

1 someone that would be subjective. He's not a machine
2 guy, as he says. So --

3 Q. Okay.

4 A. -- he was like -- I think I was the host and he
5 was like -- he would comment and give me all the hard
6 questions.

7 Q. And in connection with that screening with
8 Mr. Bannon, did you specifically mention the -- that the
9 Smartmatic machines were part of an attack on the
10 country in connection with the 2020 election?

11 A. I have no idea. No idea.

12 Q. Okay. Did you mention that Smartmatic is lying
13 about its machines not being connected to the Internet?

14 A. That their machines are all connected, a
15 hundred percent, I said that to all machines.

16 Q. Okay.

17 A. I've said that a million times, because they
18 are.

19 Q. Okay. And what's your basis for saying that,
20 Mr. Lindell?

21 A. What's my basis?

22 Q. Yes.

23 A. I have devices that show they're all on the
24 Internet and see --

25 Q. You have devices from Smartmatic, sir?

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
196

1 A. Well, no. We can -- we can be in the same room 12:41PM
2 as Smartmatic -- and I have -- and we have the cast vote 12:41PM
3 records now from LA County, the cast vote records from 12:41PM
4 both 2020 and the 2022 election. I paid thousands of 12:41PM
5 dollars for them to get them right from the city, and I 12:42PM
6 got them from them. 12:42PM

7 It shows one hundred percent computer 12:42PM
8 manipulation. It actually matches, incidentally, with 12:42PM
9 Mesa County's image from Colorado, and -- which was 12:42PM
10 Dominion. They're identical. The algorithm stuff, it's 12:42PM
11 not -- there's no in between. You either have computer 12:42PM
12 manipulation online or you don't. There's no in 12:42PM
13 between. You don't have partial. And Smartmatic, 12:42PM
14 hundred percent guilty. 12:42PM

15 Q. Mr. Lindell, are you a computer expert? 12:42PM

16 A. Huh? 12:42PM

17 Q. Are you a computer expert? 12:42PM

18 A. No, but I'm a numbers expert -- 12:42PM

19 Q. Right. 12:42PM

20 A. -- at deviations, beyond anybody you've ever 12:42PM
21 met, if you really want to know the truth. 12:42PM

22 Q. Do you know how to read source code? 12:42PM

23 A. Do I know source code? No, but I hire guys 12:42PM
24 that are really good -- 12:42PM

25 Q. Okay. 12:42PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
197

1 A. -- the best in the world that have worked for 12:42PM
2 our government for years. 12:42PM

3 Q. Okay. Who are those guys, sir? 12:42PM

4 MR. KACHOUROFF: Okay. Hold on. I'm going 12:42PM
5 to object. If you start doing this staccato back and 12:42PM
6 forth that quickly, she's going to get -- 12:42PM

7 THE WITNESS: Right. 12:42PM

8 MR. KACHOUROFF: -- irritated again. 12:42PM

9 So I -- Nicole, I need you to slow down as 12:42PM
10 well. 12:42PM

11 MS. WRIGLEY: Sure. 12:42PM

12 Q. (BY MS. WRIGLEY) Who are the guys that you 12:42PM
13 hired, sir? 12:42PM

14 A. I could list off so many of them. Well, we -- 12:42PM
15 I've talked to generals and colonels. I told you that. 12:43PM
16 I've hired Conan Hayes, Sean Smith. But he's not paid, 12:43PM
17 but he's a -- he was a Colonel who worked with cyber 12:43PM
18 with the government. Oh, let's see. Yeah, Clay Parikh. 12:43PM
19 Walter Daughterity. 12:43PM

20 The list goes on. I could name 50 of them. 12:43PM
21 Ben -- Ben Cotton. These guys all worked for the 12:43PM
22 government. Another guy hired in Texas here, he worked 12:43PM
23 for the government. He validated the machines. This 12:43PM
24 guy is a -- the government stamps him. He's the one 12:43PM
25 that stamps them, that stamps them. 12:43PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
198

1 Q. Any other names, sir?

12:43PM

2 A. I forget his name.

12:43PM

3 Q. Just their names.

12:43PM

4 A. No. Yeah, I don't know his name, but I could
5 name -- if I -- I just named some of them. There's at
6 least 30 that I've either hired directly or they did it
7 on their own and said here, this is -- Jeff O'Donnell's
8 another one.

12:43PM

12:43PM

12:43PM

12:43PM

12:44PM

9 Dennis Montgomery, he worked for the
10 government for 15, 20 years for the CIA. These are --
11 guys are the best cyber guys in the world. They're
12 White Hat hackers that have to block us from cyber
13 attacks, and they've all --

12:44PM

12:44PM

12:44PM

12:44PM

12:44PM

14 Q. So --

12:44PM

15 A. -- either worked for the government or they
16 worked with Hammer Scorecard, like General McInerney.
17 When you guys finally depose him, he was right there.
18 He's got -- you know, hearing it from a general? You're
19 going, okay, I kind of believe my generals, so...

12:44PM

12:44PM

12:44PM

12:44PM

12:44PM

20 Q. Mr. Lindell, can I --

12:44PM

21 A. But, yeah, and there's other ones too that
22 we've --

12:44PM

12:44PM

23 Q. I want to ask you about these -- this --
24 machines in LA County that you looked at. Have you
25 looked at them yourself, sir?

12:44PM

12:44PM

12:44PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
199

1 A. What's that? 12:44PM

2 Q. Have you looked at the LA machines yourself, 12:44PM

3 sir? 12:44PM

4 A. No. My people did. They -- 12:44PM

5 Q. Okay. And -- 12:44PM

6 A. All of my people did. 12:44PM

7 Q. Please identify the specific names of every 12:44PM

8 individual that you understand has looked at machines 12:44PM

9 from LA County for the election in 2020. 12:44PM

10 A. Jeff O'Donnell. 12:44PM

11 Q. Okay. 12:44PM

12 A. I believe Walter Daugherity, Clay Parikh, Ben 12:44PM

13 Cotton, Conan Hayes, Todd Sanders. I could keep naming 12:45PM

14 them. I... 12:45PM

15 Q. Okay. And did any of those individuals have 12:45PM

16 access to the source code for the LA County VSAP voting 12:45PM

17 machines that were used in the 2020 election, sir? 12:45PM

18 A. I believe, yes. 12:45PM

19 Q. And how did they get that access? 12:45PM

20 A. I don't know. I don't know. But they do have 12:45PM

21 the cast vote records, which is under the Freedom of 12:45PM

22 Information Act. That's where I -- we -- we got it all. 12:45PM

23 We got it all from there. 12:45PM

24 Q. And do you have records of specific voters and 12:45PM

25 how they voted for in the 2020 election? 12:45PM

MICHAEL J. LINDELL
SMARTMATIC USA vs LINDELL

June 11, 2024
200

1 A. You can't -- you can't get that. Cast vote 12:45PM
2 records don't show that --

3 Q. Okay.

4 A. -- machine analogy.

5 Q. That's private information, sir, right?

6 A. Yeah. Yeah. Yeah. You --

7 Q. Okay.

8 A. Yeah, you're very subtle.

9 THE COURT REPORTER: Okay. I didn't get
10 any of that because --

11 THE WITNESS: She's being sarcastic.

12 MR. KACHOUROFF: Stop. Stop, Mike.

13 THE WITNESS: She's trying to be funny.

14 MR. KACHOUROFF: Hey, hey, hey. Wait, 12:45PM
15 wait. Both of you are causing this. 12:45PM

16 THE WITNESS: Yeah. 12:45PM

17 MR. KACHOUROFF: You just need to slow 12:45PM
18 down, let him finish. I know he's long-winded, but 12:45PM
19 you're asking open-ended questions. 12:45PM

20 MS. WRIGLEY: Okay. 12:45PM

21 THE WITNESS: She was trying to be funny. 12:45PM
22 I caught her. 12:46PM

23 MR. KACHOUROFF: Okay. 12:46PM

24 Q. (BY MS. WRIGLEY) Okay. Sir, I've got -- 12:46PM

25 A. Can I say one more thing there? 12:46PM